

FILED
SUPREME COURT
STATE OF WASHINGTON
10/8/2019 12:12 PM
BY SUSAN L. CARLSON
CLERK

NO. 97637-6

SUPREME COURT OF THE STATE OF WASHINGTON

ARELY JIMENEZ,

Petitioner,

v.

WASHINGTON STATE DEPARTMENT OF HEALTH,

Respondent.

DEPARTMENT'S ANSWER TO MOTION TO EXTEND TIME

ROBERT W. FERGUSON
Attorney General

HEATHER CARTER
Assistant Attorney General
WSBA #30477
7141 Cleanwater Dr SW
PO Box 40109
Olympia, WA 98504-0109
360-586-6474
OID #91030

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I. IDENTITY OF RESPONDENT

Respondent Washington State Department of Health (Department) respectfully submits this Answer opposing Petitioner Arely Jimenez's (Jimenez) request to extend the deadline to file a petition for discretionary review.

II. INTRODUCTION

Jimenez asks this Court to authorize the late filing of her petition for discretionary review. While the Department is sympathetic to Jimenez's request, her circumstances do not constitute "extraordinary circumstances" that outweigh the desirability of finality of decisions. RAP 18.8(b). In this case, the stated policy of RAP 18.8(b) favoring the finality of decisions outweighs the uncommon privilege of extending additional time to Jimenez.

III. PROCEDURAL HISTORY

This case involves an appeal from the Department's final administrative order against Jimenez. The Department found that Jimenez was practicing medicine and naturopathy without a license and issued a Final Order, which contained a permanent cease and desist order for the unlicensed practice of medicine and naturopathy and a finding of unprofessional conduct under the Uniform Disciplinary Act, RCW 18.130. Jimenez petitioned for judicial review of the Final Order in Thurston

County Superior Court. The superior court affirmed the Final Order. Jimenez then sought review of the Final Order in the Court of Appeals. The Court of Appeals, Division I issued an unpublished opinion on August 5, 2015, in which it found no errors and affirmed the Department's Final Order. See Appendix A.

The deadline for filing a petition for discretionary review by this Court was September 4, 2019. On September 6, 2019, Jimenez filed an untimely petition for discretionary review. Following the untimely filing, the Court issued a letter notifying Jimenez of the late filing and stating that she would be required to file a motion for an extension of time for the Court to consider her petition for discretionary review. See Appendix B. Jimenez filed a motion for extension of time on September 24, 2019, asking this Court to authorize the late filing of her petition.

IV. LAW AND ARGUMENT

A. Jimenez's Petition for Discretionary Review Was Untimely

Jimenez filed her petition for discretionary review two days late. RAP 13.4(a) requires a petition for discretionary review be filed within 30 days of the Court of Appeals' decision. Here, the Court of Appeals issued its decision on August 5, 2015, making the deadline for filing the petition for discretionary review September 4, 2019. Jimenez filed her petition on September 6, 2019. As recognized by this Court in its letter of

September 13, 2019, Jimenez filed her petition late. Jimenez does not argue otherwise.

B. Jimenez’s Grief Does not Constitute an Extraordinary Circumstance that Outweighs the Desirability of Finality of the Court of Appeals’ Decision

Jimenez does not demonstrate extraordinary circumstances requiring an extension of time. The Rules of Appellate Procedure authorize this Court to enlarge the time for filing petitions for discretionary review in limited circumstances in order to serve the ends of justice. RAP 18.8(b) permits such an extension “only in extraordinary circumstances and to prevent a gross miscarriage of justice” and clearly favors the policy of finality of judicial decisions over the competing policy of reaching the merits in every case. *Reichelt v. Raymark Indus., Inc.*, 52 Wn. App. 763, 765, 764 P.2d 653 (1988). Specifically, RAP 18.8(b) provides:

“The appellate court will only in extraordinary circumstances and to prevent a gross miscarriage of justice extend the time within which a party must file a notice of appeal, a notice for discretionary review, a motion for discretionary review of a decision of the Court of Appeals, a petition for review, or a motion for reconsideration. The appellate court will ordinarily hold that the desirability of finality of decisions outweighs the privilege of a litigant to obtain an extension of time under this section. The motion to extend time is determined by the appellate court to which the untimely notice, motion or petition is directed.”

Wash. R. App. P. 18.8.

“Extraordinary circumstances” include instances in which “the filing, despite reasonable diligence, was defective due to excusable error or circumstances beyond the party's control.” *State v. Hand*, 177 Wn. 2d 1015, 308 P.3d 588, 589 (2013) (citing *Reichelt v. Raymark Indus., Inc.*, 52 Wn. App. 763, 765, 764 P.2d 653 (1988); *Shumway v. Payne*, 136 Wn.2d 383, 395, 964 P.2d 349 (1998)). As noted by this Court in *Shumway*, “the standard set forth in rule is rarely satisfied.” *Shumway* at 395. In the cases where the Court has allowed an untimely notice of appeal, the moving party actually filed the notice of appeal within the 30-day period, but some aspect of the filing was challenged. *Reichelt* at 765, emphasis added. For example, in *Weeks v. Chief of State Patrol*, the Court allowed the appeal to proceed when the notice of appeal was timely filed, but was filed in the wrong Court. *Weeks v. Chief of State Patrol*, 96 Wn.2d 893, 895-96, 639 P.2d 732 (1982). *See also State v. Ashbaugh*, 90 Wn.2d 432, 438, 583 P.2d 1206 (1978) (notice *timely* filed but rejected by court for lack of filing fee); *Structurals N.W., Ltd. v. Fifth & Park Place, Inc.*, 33 Wn. App. 710, 714, 658 P.2d 679 (1983) (notice timely when filed within 30 days of entry of stipulated “amended” judgment). *See also Meyers v. Harris*, 82 Wn.2d 152, 155, 509 P.2d 656 (1973) (notice timely filed but filing fee not paid).

In this case, Jimenez states that she had two deaths in her extended family, one on August 26 and another a week later. Motion at page 2. These deaths occurred three weeks into the 30-day period for filing. Jimenez provides little evidence regarding these deaths. Jimenez also states that her “mind played tricks on the date” and that she did not see the filing date of the Court of Appeals opinion until later when the “filing date jumped at her.” Motion, page 3. She does not explain when she thought the petition for discretionary review was due. Negligence or the lack of reasonable diligence are not extraordinary circumstances to allow an extension of time. *Beckman v. State*, 102 Wn. App. 687, 695, 11 P.3d 313 (2000). Unlike the cases in which extraordinary circumstances were established, where service was made but was defective, Jimenez did not file her petition within the 30-day period. Her lack of diligence in keeping track of the deadline is not an extraordinary circumstance that justifies an extension of time.

A party’s failure to identify any extraordinary circumstances when seeking an extension of time within which to file a motion for discretionary review, as is required under RAP 18.8(b), requires that the motion be denied. *City of Mount Vernon v. Weston*, 68 Wn. App. 411, 844 P.2d 438 (1992). Jimenez cites RAP 1.2(a) for the statement that cases will not be determined on the basis of noncompliance with these rules

except in compelling circumstances. However, RAP 1.2(a) is “subject to the restrictions in rule 18.8(b).” Those restrictions are described above. Therefore, Jimenez’s motion for an extension of time must be denied.

V. CONCLUSION

Jimenez has failed to demonstrate any extraordinary circumstance sufficient to allow consideration of her untimely petition for discretionary review. The Department respectfully requests that this Court deny Jimenez’s motion and dismiss this appeal.

RESPECTFULLY SUBMITTED this 8th day of October, 2019.

ROBERT W. FERGUSON
Attorney General

/s/ Heather Carter
HEATHER CARTER, WSBA 30477
Assistant Attorney General
Agriculture and Health Division
7141 Cleanwater Drive SW
PO Box 40109 Olympia, WA 98504
Phone: 360-586-6474

PROOF OF SERVICE

I certify that I served a copy of this document on all parties or their counsel of record on the date below as follows:

- Via email to areshealth@yahoo.com
- US Mail Postage Prepaid via Consolidated Mail Service, and
- Federal Express Priority Overnight Delivery to:

ARELY JIMENEZ
981 DIANE AVENUE
OAK HARBOR, WA 98277

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 8th day of October 2019, at Olympia, Washington.

/s/ Krystle Berry
KRYSTLE BERRY
Legal Assistant

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

| | | |
|-----------------------------|---|-----------------------|
| ARELY JIMENEZ, |) | |
| |) | No. 79690-9-1 |
| Appellant, |) | |
| |) | DIVISION ONE |
| v. |) | |
| |) | |
| WASHINGTON STATE DEPARTMENT |) | UNPUBLISHED OPINION |
| OF HEALTH, |) | |
| |) | FILED: August 5, 2019 |
| Respondent. |) | |
| _____ | | |

SMITH, J. — Arely Jimenez appeals an order by the Department of Health (Department) finding that she engaged in the unlicensed practice of medicine and naturopathy and committed unprofessional conduct by doing so. She argues that the Department violated her constitutional rights and acted arbitrarily and capriciously in entering its findings and assessing sanctions against her. Finding no errors, we affirm.

FACTS

Jimenez is a state-licensed marriage and family therapist (MFT). Jimenez obtained a doctor of natural health degree from Clayton College, a nonaccredited institution, which the Department does not recognize as a credential for obtaining a license to practice natural medicine. She also attended a nonaccredited online

school to study the practice of Ñedicine.¹ At the end of the coursework, the “American Ñedicine Licensing Board, Inc.” issued Jimenez a license to practice Ñedicine and assured her that the license was valid to practice nationwide. Jimenez never obtained a license to practice medicine or naturopathy from the Department.

In December 2014, Jimenez opened Whidbey Naturals Alternative Medicine (Whidbey Naturals) with Clarence Hugh Jonson, a man she met at her church who represented himself as an attorney and board-certified naturopathic physician. From December 2014 through February 2015, Jimenez saw five patients and treated them for varying ailments, including high blood pressure, thyroid issues, celiac disease, insomnia, back pain, fatigue, tremors, and balance issues. She treated these patients with natural supplements, energy treatments, and diet and exercise recommendations.

Unfortunately for Jimenez, Jonson was a fraud. Unbeknownst to her, he did not have any license or credential to practice medicine or naturopathy in Washington. The Department received two complaints about Whidbey Naturals and opened an investigation. On January 2, 2015, investigators Mitchell Anderson and Kathleen Mills posed as husband and wife during an appointment with Jimenez, and Jimenez stated that she could help Mills with her fibromyalgia and chronic fatigue symptoms. When Anderson and Mills dropped by without an appointment on February 5, 2015, Jimenez told them that she could treat their

¹ Beverly Jackson, who issued Jimenez’s doctorate of Ñedicine degree, described Ñedicine as a branch of alternative medicine that is based on quantum electrodynamics and quantum physics.

fictional son's posttraumatic stress disorder. Oak Harbor police arrested Jimenez on February 17, 2015, for practicing medicine without a license.

After a hearing, the Department issued an initial order finding that Jimenez engaged in the unlicensed practice of medicine and naturopathy and that her actions constituted unprofessional conduct. It issued a permanent cease and desist order, imposed \$5,000 in sanctions, and placed her MFT license on probation until the fines were paid in full. Jimenez appealed the initial order and a review officer affirmed and issued findings of fact, conclusions of law, and a final order. The trial court affirmed the Department's final order. Jimenez appeals to this court.

UNPROFESSIONAL CONDUCT

Jimenez argues that the Department acted arbitrarily and capriciously in accusing her of unprofessional conduct under RCW 18.130.180. We disagree.

"The Washington Administrative Procedure Act (APA), chapter 34.05 RCW, governs judicial review of agency decisions." Faghih v. Dental Quality Assur. Comm'n, 148 Wn. App. 836, 842, 202 P.3d 962 (2009). "We review agency action from the same position as the superior court and review the administrative record rather than the superior court's findings or conclusions." Crosswhite v. Dep't of Soc. & Health Servs., 197 Wn. App. 539, 548, 389 P.3d 731, review denied, 188 Wn.2d 1009 (2017).

"To find an agency's decision to be arbitrary and capricious we must conclude that the decision is the result of willful and unreasoning disregard of the facts and circumstances." Providence Hosp. of Everett v. Dep't of Soc. & Health

Servs., 112 Wn.2d 353, 356, 770 P.2d 1040 (1989). “Judging whether the [agency’s] decision was arbitrary and capricious requires an evaluation of the evidence produced at the hearing.” Pierce County Sheriff v. Civil Serv. Comm’n for Sheriff’s Emps., 98 Wn.2d 690, 695, 658 P.2d 648 (1983). “The scope of court review should be very narrow, however, and one who seeks to demonstrate that action is arbitrary and capricious must carry a heavy burden.” Pierce County Sheriff, 98 Wn.2d at 695. “Findings of fact from the agency’s final order are reviewed under the substantial evidence test and will be upheld if supported by a sufficient quantity of evidence to persuade a fair-minded person of the order’s truth or correctness.” Crosswhite, 197 Wn. App. at 548.

Under RCW 18.130.180(1), “[t]he commission of any act involving moral turpitude, dishonesty, or corruption relating to the practice of the person’s profession, whether the act constitutes a crime or not,” constitutes unprofessional conduct. “The principal question that arises in applying this statute concerns the relationship between the practice of the profession and the conduct alleged to be unprofessional.” Haley v. Med. Disciplinary Bd., 117 Wn.2d 720, 731, 818 P.2d 1062 (1991). “To serve as grounds for professional discipline under RCW 18.130.180(1), conduct must be ‘related to’ the practice of the profession . . . meaning that the conduct must indicate unfitness to bear the responsibilities of, and to enjoy the privileges of, the profession.” Haley, 117 Wn.2d at 731.

Here, the Department found that

[re]spondent’s conduct in falsely holding herself out as a licensed naturopath was an act of dishonesty. Her practice of medicine without a license raises concerns that she may use her professional position to harm members of the public (in this case, her clients or

patients). Respondent's conduct also tends to lower the standing of the marriage and family therapy profession in the eyes of the public. Therefore, Respondent's conduct meets the definition of moral turpitude.

Jimenez takes issue with the term of art "moral turpitude." Even though she does not assign error to the Department's finding on appeal, she argues that she did not commit moral turpitude because her "intent has always been to do good by others," she believed her Medicine license was valid, she "believes in doing good works," and she closed her counseling practice. Even so, substantial evidence supports the Department's finding that Jimenez held herself out as a licensed naturopath when she had no such license. Specifically, Jimenez sent an e-mail to Premera Blue Cross to update her contact information with that insurance provider and stated, "I am also a licensed Naturopath." Additionally, both Anderson and Mills testified that during their undercover investigation, Jimenez held herself out to them as a naturopathic doctor. This is substantial evidence that she falsely held herself out as a licensed naturopath, conduct that was dishonest and constituted unprofessional conduct. Therefore, the Department's finding that she violated RCW 18.130.180(1) was not arbitrary and capricious.

Jimenez argues that reversal of the Department's final order is necessary because the trial court "acknowledged that charging Appellant with [RCW] 18.130.180(1) was abusive." But the trial court simply opined that sometimes "the law uses the worst terms possible to describe conduct" and that was true of the term "moral turpitude" to describe dishonest behavior. The trial court held that the Department's finding that Jimenez committed unprofessional

conduct was supported by substantial evidence. The trial court's comment does not require reversal.

Jimenez also argues that none of her former clients testified that she held herself out as a naturopath or a doctor of medicine. But given Jimenez's e-mail to Premera Blue Cross and the testimony by Anderson and Mills that Jimenez held herself out as a naturopathic doctor to them, there was substantial evidence that she held herself out as a naturopathic doctor despite the absence of testimony from other clients.

Jimenez asserts that Anderson and Mills lied and that the e-mail to Premera Blue Cross was altered. But because the Department's hearing officer was in the best position to observe the evidence and witness testimony, we do not weigh the credibility of witnesses or substitute our judgment for the agency's findings of fact. Port of Seattle v. Pollution Control Hr'gs Bd., 151 Wn.2d 568, 588, 90 P.3d 659 (2004). Therefore, this assertion does not warrant reversal.

Finally, Jimenez argues that application of RCW 18.130.180 to her constitutes a violation of RCW 34.05.570(2), which addresses judicial review of the validity of an agency rule. But because the Department found that Jimenez violated RCW 18.130.180 in an agency order and not during a rule-making process, RCW 34.05.570(2) does not apply.

SANCTIONS

Jimenez argues that the sanctions imposed by the Department should be reversed. We disagree.

Under RCW 18.71.021, “[n]o person may practice or represent himself or herself as practicing medicine without first having a valid license to do so.” A person practices medicine if she “[o]ffers or undertakes to diagnose, cure, advise, or prescribe for any human disease, ailment, injury, infirmity, deformity, pain or other condition, physical or mental, real or imaginary, by any means or instrumentality.” RCW 18.71.011(1). RCW 18.130.190(3) authorizes the Department to “impose a civil fine in an amount not exceeding one thousand dollars for each day upon which the person engaged in unlicensed practice of a business or profession for which a license is required.”

Here, the review officer found that Jimenez “diagnosed, advised and treated Patients C, D, E, F, and G for medical conditions such as high blood pressure, thyroid issues, celiac disease, tremors, back pain, possible kidney issues, and depression.” This finding is supported by each patient’s records and the testimony of patients D, E, F, and G, which constitute substantial evidence to support the finding. The Department ordered Jimenez to pay a \$5,000 administrative fine: \$1,000 for each of the five patients she treated.

Jimenez argues that the amount of the fine was excessive because she has not worked since February 2015 due to the administrative proceedings and health issues caused by the stress of those proceedings. While we acknowledge that the fine may pose a financial burden to her, we can reverse only if the Department’s decision to impose it was arbitrary and capricious. Because the fine was authorized by statute and did not exceed the amount delimited by the statute, we cannot hold that it was arbitrary and capricious.

For the first time in her reply brief, Jimenez argues that there is no evidence that she practiced medicine. But she does not address the actions described in RCW 18.71.011(1), only the actions in RCW 18.71.011(2)-(4). Because there is substantial evidence that Jimenez took some of the actions described in RCW 18.71.011(1), her argument is not persuasive.

CONSTITUTIONAL VIOLATIONS

Jimenez argues that her constitutional rights were violated at various times throughout the investigation and administrative process and reversal is necessary. We disagree.

Constitutional questions are issues of law and are reviewed de novo. McDevitt v. Harborview Med. Ctr., 179 Wn.2d 59, 64, 316 P.3d 469 (2013).

First, Jimenez argues that the Oak Harbor police violated her constitutional rights when they arrested her. Because this action involves an administrative proceeding between Jimenez and the Department and not a criminal proceeding or a civil lawsuit under 42 U.S.C. § 1983, the actions of the Oak Harbor police, however offensive to Jimenez, are not properly before this court. Therefore, we decline to address them as a basis for reversing the Department's final order.

Next, Jimenez argues that the Department violated her Fourteenth Amendment due process right to a fair trial by denying her rights under the Sixth Amendment to the United States Constitution and article I, section 22 of the Washington Constitution. She claims that she was denied her right to present a defense under the Sixth Amendment and article I, section 22 when the hearing

officer failed to issue subpoenas to three witnesses and when the hearing officer excluded some of her exhibits at the hearing. She also argues that her Sixth Amendment right to effective assistance of counsel was violated. We note that both the Sixth Amendment and article I, section 22 apply to only criminal prosecutions and Jimenez's probation and fine is a civil penalty, not a criminal punishment. See Chmela v. Dep't of Motor Vehicles, 88 Wn.2d 385, 392, 561 P.2d 1085 (1977) (article I, section 22 and the Sixth Amendment are inapplicable in civil cases). Therefore, her due process rights were not violated because she is not entitled to protection under the Sixth Amendment or article I, section 22. Any grievances Jimenez has against her attorney must proceed as a separate malpractice claim.

Jimenez also argues that the Department's final order violates her First Amendment right to list her accomplishments as a doctor of natural health and of Ćedicine. But the Department has not restricted Jimenez's right to list her degrees among her accomplishments. Rather, it issued a cease and desist order that restricted her from practicing medicine and naturopathy without a license. Because Jimenez does not have a license to practice medicine or naturopathy, the Department did not violate her First Amendment rights by issuing the cease and desist letter.

Finally, Jimenez argues that the Department has violated her right to freedom of religion under the First Amendment to the United States Constitution and article I, section 11 because her practice of Ćedicine was related to her religious beliefs. Article I, section 11 "parallels the First Amendment's religious

Establishment and Free Exercise Clauses.” Open Door Baptist Church v. Clark County, 140 Wn.2d 143, 151, 995 P.2d 33 (2000). “If government action burdens the exercise of religion, but the State demonstrates that it has a compelling interest in enforcing its enactment, that interest will justify the infringement of First Amendment rights.” First Covenant Church of Seattle v. City of Seattle, 120 Wn.2d 203, 222, 840 P.2d 174 (1992). “[C]ompelling interests are based in the necessities of national or community life such as clear threats to public health, peace, and welfare.” Munns v. Martin, 131 Wn.2d 192, 200, 930 P.2d 318 (1997). Here, even assuming that the Department’s actions have infringed on Jimenez’s right to freedom of religion, the Department has a compelling public health and welfare interest in limiting the practice of medicine and naturopathy to individuals licensed by the Department. To the extent that Jimenez’s practice of medicine without a Washington license burdened her exercise of religion, the Department’s interest in public health and safety justified any infringement of her constitutional rights.

For the first time in her reply brief, Jimenez argues that the Department violated her due process rights by notifying insurance companies about the charges against her before a final order was issued. Also for the first time in her reply, she argues that the Department violated her due process rights because it did not apply a clear and convincing standard of proof to the evidence presented. But because these issues were raised in her reply brief and there was no opportunity for the Department to respond, we decline to consider them. RAP 10.3(c).

TRIAL COURT PROCEEDINGS


Jimenez argues that the trial court erred during its review of the Department's final order. But any errors by the trial court do not affect our review.

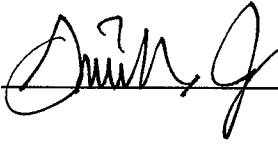
As the reviewing court, we sit in the same position as the superior court and apply the APA standards directly to the record before the agency. King County Pub. Hosp. Dist. No. 2 v. Dep't of Health, 178 Wn.2d 363, 372, 309 P.3d 416 (2013). "[W]e do not give deference to the superior court's rulings." Verizon Nw., Inc. v. Emp't Sec. Dep't, 164 Wn.2d 909, 915, 194 P.3d 255 (2008).

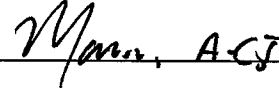
Jimenez argues that the trial court erred both in granting the Department's motion to strike exhibits attached to her briefing and in considering an unpublished federal court order attached as an appendix to the Department's brief. Additionally, Jimenez argues that the trial court misstated the record when it said that she had nine clients, rather than the actual number of five. Finally, she argues that the trial court erred in concluding that she was not really Jonson's victim. The trial court did not actually say that Jimenez was not a victim. Even assuming it did, because we apply the APA standards directly to the administrative record and do not give deference to the superior court's rulings, none of these alleged errors affect our analysis on appeal and they are not a basis for reversal.

We affirm.

WE CONCUR:







THE SUPREME COURT

STATE OF WASHINGTON



SUSAN L. CARLSON
SUPREME COURT CLERK

ERIN L. LENNON
DEPUTY CLERK/
CHIEF STAFF ATTORNEY

TEMPLE OF JUSTICE

P.O. BOX 40929
OLYMPIA, WA 98504-0929

(360) 357-2077
e-mail: supreme@courts.wa.gov
www.courts.wa.gov

September 13, 2019

LETTER SENT BY E-MAIL

Arely Jimenez (**sent by U.S. mail**)
981 Diane Avenue
Oak Harbor, WA 98277

Heather Ann Carter
Attorney General's Office
P.O. Box 40109
7141 Cleanwater Drive SW
Olympia, WA 98504-0109

Hon. Richard Johnson, Clerk
Division I, Court of Appeals
One Union Square
600 University Street
Seattle, WA 98101

Re: Supreme Court No. 97637-6 - Arely Jimenez v. Washington State Department of Health
Court of Appeals No. 79690-9-I

Clerk, Counsel and Ms. Jimenez:

On September 6, 2019, the Court of Appeals forwarded to this Court the "APPELLANT'S REQUEST FOR REVIEW". The \$200 filing fee (check #3188) has also been received. The matter has been assigned the Supreme Court cause number indicated above.

A review of the Court of Appeals case indicates the Court of Appeals decision terminating review was filed on August 5, 2019. RAP 13.4(a) requires the filing of a petition for review within 30 days after a decision terminating review *is filed* (not 30 days after the decision was received by the parties). Therefore, the petition was due for filing on September 4, 2019. The petition for review was not received until September 6, 2019, and therefore it is untimely.

The Petitioner may seek an extension of time in which to file the petition for review by filing a motion for extension of time to file a petition for review. Any such motion should be served and filed in this Court by September 27, 2019. The motion should be supported by an appropriate affidavit establishing good cause for the delay in filing the petition for review; see RAP 18.8 for information on extension of time for filings and RAP Title 17 for the general rules governing motions. A motion for extension of time to file is normally not granted; see RAP 18.8(b).

At such time as the Petitioner serves and files a motion for extension of time to file a petition for review a date will be established by which the Respondent may serve and file both an answer to the motion for extension of time and an answer to the petition for review.



The parties are referred to the provisions of General Rule 31(e) in regards to the requirement to omit certain personal identifiers from all documents filed in this court. This rule provides that parties “shall not include, and if present shall redact” social security numbers, financial account numbers and driver’s license numbers. As indicated in the rule, the responsibility for redacting the personal identifiers rests solely with counsel and the parties. The Clerk’s Office does not review documents for compliance with the rule. Because briefs and other documents in cases that are not sealed may be made available to the public on the court’s internet website, or viewed in our office, it is imperative that such personal identifiers not be included in filed documents.

Correspondence from this Court will be sent to the Petitioner via U.S. mail. Correspondence from this Court will be sent to counsel for the Respondent by e-mail attachment, not by regular mail. This office uses the e-mail address that appears on the Washington State Bar Association lawyer directory. Counsel are responsible for maintaining a current business-related e-mail address in that directory.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Lennon", with a stylized flourish extending to the right.

Erin L. Lennon
Supreme Court Deputy Clerk

ELL:sk

ATTORNEY GENERAL'S OFFICE

October 08, 2019 - 12:12 PM

Transmittal Information

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Superior Court Case Number: 17-2-03404-2

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